

EXHIBIT 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)
WAYMO LLC,)

)
)
Plaintiff,)

)
)
vs.) Case No.:

) 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.,)

OTTOMOTTO LLC; OTTO TRUCKING)

LLC,)

)
)
Defendants.)

ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF JAMES HASLIM
San Francisco, California
Tuesday, April 18, 2017
Volume 1

Reported by:

RACHEL FERRIER, CSR No. 6948

Job No. 2597892

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VIDEOTAPED DEPOSITION OF JAMES HASLIM,
VOLUME 1, taken on behalf of the Plaintiff, at Quinn
Emanuel Urquhart & Sullivan, LLP, 50 California Street,
22nd Floor, San Francisco, California, beginning at
9:13 a.m. and ending at 11:49 a.m. on Tuesday,
April 18, 2017, before RACHEL FERRIER, Certified
Shorthand Reporter No. 6948.

1 company. 09:25:42

2 Q Okay. What is your understanding of 09:25:42

3 Mr. Levandowski's involvement in Oden Wave, slash, Tyto 09:25:46

4 LiDAR? 09:25:50

5 A I don't know of any involvement of Anthony 09:25:50

6 Levandowski and Tyto LiDAR or Oden Wave. 09:25:56

7 Q Did you ever see Mr. Levandowski at Tyto LiDAR, 09:26:01

8 slash, Oden Wave's offices? 09:26:05

9 A Yes. While we were at the Dwight Way address in 09:26:07

10 Berkeley, I did see Anthony Levandowski at that 09:26:10

11 location. 09:26:14

12 Q And the Dwight Way address -- Mr. Levandowski 09:26:14

13 owns that building; right? 09:26:15

14 A I don't know. 09:26:17

15 Q Okay. So you are not aware that Mr. Levandowski 09:26:17

16 owns that -- the building at Dwight Way; is that right? 09:26:19

17 A I don't have firsthand knowledge of that, no. 09:26:22

18 Q Do you have any knowledge of that? 09:26:25

19 A Rumor, speculation. I believe I had heard that 09:26:26

20 he was the owner of the building. 09:26:30

21 Q Did that surprise you? 09:26:31

22 A No. 09:26:34

23 Q When did you learn that? 09:26:35

24 A I think it would have been after I was working 09:26:36

25 there sometime. 09:26:41

1 Q When did you first see Mr. Levandowski at 09:26:42
2 Oden Wave, slash, Tyto LiDAR's offices? 09:26:47
3 A I don't recall. 09:26:51
4 Q How often did he show up? 09:26:53
5 A There was no regular rou- -- routine or 09:26:54
6 repetition to it. It was sporadic on and off. 09:27:02
7 Q Once a week? 09:27:06
8 A Don't recall it being necessarily once a week. I 09:27:07
9 don't know. 09:27:14
10 Q Twice a week? 09:27:14
11 A You know, I don't think it was that often. 09:27:15
12 Q Every other week? 09:27:19
13 A You can -- you're trying to get me to narrow down 09:27:20
14 exactly what the -- the rate was, but, again, I'm trying 09:27:25
15 to say there was no -- I don't recall any specific 09:27:27
16 cadence or -- or repetition rate to it. 09:27:29
17 Q So I understand you are saying you don't recall 09:27:32
18 exactly how often he showed up. 09:27:35
19 A Yes. 09:27:37
20 Q What I'm trying to understand is the bounds of 09:27:37
21 your memory here. 09:27:40
22 So is it fair to say that you wouldn't dispute 09:27:42
23 that he showed up once every other week? 09:27:46
24 A No. If somebody suggested that was the case, I 09:27:49
25 would not contest that. 09:27:51

1 Q Okay. When Mr. Levandowski showed up at Tyto 09:27:52
2 LiDAR, why was he there? 09:28:04
3 A I believe he had an office in the building. 09:28:05
4 Q And what was he doing? 09:28:11
5 A I don't know. 09:28:13
6 Q Did you ever talk with him? 09:28:14
7 A Occasionally. 09:28:15
8 Q About what? 09:28:16
9 A He would ask questions about the business, how we 09:28:17
10 were doing; chat, as a friend. 09:28:21
11 Q It was not formally related to the business? 09:28:24
12 A Which business? 09:28:27
13 Q Tyto LiDAR. 09:28:28
14 A Not to my knowledge. 09:28:30
15 Q Are you familiar with a company called Dogwood 09:28:31
16 Leasing? 09:28:34
17 A I have heard the name Dogwood Leasing. 09:28:34
18 Q What's your understanding of that company? 09:28:37
19 A My understanding was we were using some 09:28:38
20 consultants that were hired by Dogwood Leasing for labor 09:28:42
21 in Oden Wave/Tyto LiDAR. 09:28:47
22 Q Who decided to hire consultants from this Dogwood 09:28:48
23 Leasing company? 09:28:52
24 A I don't know. 09:28:52
25 Q Was it you? 09:28:55

1	A	No.	09:28:55
2	Q	Are you aware that Mr. Levandowski owns that	09:28:56
3		company?	09:29:01
4	A	I don't have firsthand knowledge, but I have	09:29:01
5		heard that to be the case.	09:29:05
6	Q	Why was Tyto LiDAR hiring consultants from a	09:29:07
7		company owned by Mr. Levandowski?	09:29:13
8	A	I don't know why Tyto LiDAR or Oden Wave hired	09:29:16
9		specific- -- specifically from that company.	09:29:20
10	Q	Who -- who would have decided that?	09:29:23
11	A	I believe that would have been a decision made by	09:29:24
12		Brent Schwartz.	09:29:28
13	Q	Anyone else?	09:29:28
14	A	Not necessarily.	09:29:29
15	Q	What do you mean "not necessarily"?	09:29:31
16	A	I'm not aware of anyone else's input. We -- we	09:29:33
17		had another employee of the company for legal purposes.	09:29:37
18		I don't know if they conferred. It's entirely possible.	09:29:41
19	Q	Who's the other employee you are referring to?	09:29:44
20	A	Ognen.	09:29:45
21	Q	And that's --	09:29:48
22	A	I can't pronounce his last name. Sorry.	09:29:50
23	Q	His last name?	09:29:53
24	A	"Sterginoff" [phonetic] or "Sterginoff."	09:29:54
25	Q	He actually headed Tyto LiDAR for a time; right?	09:29:56

1	A	I'm not aware of that.	09:30:02
2	Q	You are not aware of that?	09:30:03
3	A	No. No.	09:30:04
4	Q	Okay. Are you aware of the relationship with	09:30:05
5	Mr. -- I think it's Stepnowski [phonetic], or something	09:30:10	
6	along those lines, Ognen --	09:30:12	
7	A	Okay. Ognen.	09:30:12
8	Q	-- and Mr. Levan- -- Mr. Levandowski?	09:30:18
9	A	I think I had only heard that they may have known	09:30:22
10	each other from Cal.	09:30:25	
11	Q	Are you aware of an incident in 2013 where Tyto	09:30:30
12	LiDAR was ordering an identical part to one that Google	09:30:35	
13	was making at the time?	09:30:39	
14	A	No.	09:30:39
15	Q	Okay. You are not familiar with that incident?	09:30:41
16	A	I'm not familiar with Oden Wave making a part	09:30:45
17	identical to a part made by somebody else.	09:30:48	
18	Q	Would that surprise you?	09:30:51
19	A	Yes.	09:30:52
20	Q	Why?	09:30:53
21	A	How would the parts be identical?	09:30:54
22	Q	I -- I don't know.	09:30:59
23	A	That would be a reason to surprise if they were	09:31:00
24	actually truly identical.	09:31:03	
25	Q	Would it be really suspicious if they were	09:31:05

1 identical? 09:31:08

2 A It depends on the part, the nature of the part. 09:31:08

3 If the part was designed by requirements, if it was a 09:31:11

4 simple part, maybe it would not be so surprising. 09:31:14

5 Q Could be, though? 09:31:16

6 A Perhaps. 09:31:17

7 Q Okay. Who hired you at Tyto LiDAR? 09:31:18

8 A I'm not sure. I believe it would be Brent 09:31:29

9 Schwartz. 09:31:31

10 Q You are not sure who hired you? 09:31:32

11 A No. 09:31:35

12 Q How did you come to get the job? 09:31:37

13 A I spoke with a handful of people, but just in my 09:31:39

14 job today, I can't say -- it's hard for me to articulate 09:31:44

15 who hires people at our company. I would say Brent 09:31:48

16 Schwartz would be the hiring manager. In that case, I 09:31:51

17 could say it was Brent Schwartz. 09:31:54

18 Q So you said you spoke with a handful of people. 09:31:55

19 Who did you speak with? 09:31:58

20 A So I spoke with Brent Schwartz. I spoke with 09:31:59

21 Ognen -- no. What is his name. Soren Juelsgaard, and 09:32:04

22 I -- I did also, around the same time, speak with 09:32:12

23 Anthony Levandowski. 09:32:15

24 Q So when you were looking to get hired by Tyto 09:32:15

25 LiDAR, you spoke with Brent Schwartz, Anthony 09:32:22

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3
4 I, the undersigned, a Certified Shorthand
5 Reporter of the State of California, do hereby certify:

6 That the foregoing proceedings were taken before
7 me at the time and place herein set forth; that any
8 witnesses in the foregoing proceedings, prior to
9 testifying, were placed under oath; that a verbatim
10 record of the proceedings was made by me using machine
11 shorthand which was thereafter transcribed under my
12 direction; further, that the foregoing is an accurate
13 transcription thereof.

14 I further certify that I am neither financially
15 interested in the action nor a relative or employee of
16 any attorney or any of the parties.

17 IN WITNESS WHEREOF, I have this date subscribed
18 my name.

19
20 Dated: April 18, 2017

21
22 
23

24 RACHEL FERRIER

25 CSR No. 6948